

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

MATTHEW SOPRON,	)	
	)	
Plaintiff,	)	Case No. 19-cv-08254
	)	
v.	)	Judge John F. Kness
	)	
SCOTT CASSIDY, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**STATEMENT OF PLAINTIFF'S COUNSEL**

Pursuant to the Court's July 27, 2020 Order (Dkt. 99), Plaintiff submits the following statement of his counsel:

1. In a written order dated July 27, 2020 (Dkt. 99), the Court directed Plaintiff's Counsel Jonathan Loevy and Russell Ainsworth to submit statements explaining the circumstances surrounding how they became aware of the deaths of the defendants Bajenski and Ptak and whether they reviewed Plaintiff's Supplemental Statement (Dkt. 74) and Amended Supplemental Statement (Dkt. 82) before those documents were filed on the docket.

**RUSSELL AINSWORTH'S STATEMENT**

2. Mr. Ainsworth states that he has no recollection of learning about Mr. Ptak's death during the *Kluppelberg* litigation. He briefly joined the *Kluppelberg* litigation team to try the case in the event that Mr. Loevy would not be available to be lead trial counsel, but the trial was delayed and, in any event, Mr. Loevy was available to try the case. To that end, Mr. Ainsworth states that he learned of the deaths of both Mr. Ptak and Mr. Bajenski when waivers of service were sent to defense counsel in this litigation and Plaintiff's counsel was informed of their deaths in response.

3. Mr. Ainsworth reviewed both Plaintiff's Supplemental Statement (Dkt. 74) and Amended Supplemental Statement (Dkt. 82) before those documents were filed.

**JON LOEVY'S STATEMENT**

4. Mr. Loevy states that he has no independent recollection of learning of Mr. Ptak's or Mr. Bajenski's deaths until the preparation of this filing. The former apparently occurred during the *Kluppelberg* litigation for which Mr. Loevy was an attorney (and which ended prior to the initiation of the *Sopron* lawsuit). Mr. Loevy has no present recollection of how, when, or if he learned about this death during the *Kluppelberg* litigation. Mr. Loevy did not review either Plaintiff's Supplemental Statement (Dkt. 74) or Amended Supplemental Statement (Dkt. 82) before those documents were filed.

RESPECTFULLY SUBMITTED,

/s/ Russell Ainsworth  
*One of Plaintiff's Attorneys*

Arthur Loevy  
Jon Loevy  
Russell Ainsworth  
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**CERTIFICATE OF SERVICE**

I, Russell Ainsworth, an attorney, hereby certify that I served the foregoing Statement of Plaintiff's Counsel on all parties of record via the Court's CM / ECF filing system on August 10, 2020.

/s/ Russell Ainsworth